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ADMITTED IN N.Y. AND N.J.

May 18, 2016

VIA ECF & HAND DELIVERY

Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: United States v. Reza Zarrab,
S1 15 Cr. 867 (RMB)**

Dear Judge Berman:

As your Honor is aware, this firm represents **REZA ZARRAB** in connection with the above-captioned Indictment.

We respectfully enclose a formal Memorandum in support of our application for Bail on behalf of Mr. Zarrab. As your Honor will note, we have proposed quite extraordinary bail conditions that counsel believes will provide this Court with absolute assurance that Mr. Zarrab will appear in this matter whenever required by the Court and will otherwise fully comply with all of the conditions of bail to be set by your Honor. Thus, in addition to all of the other conditions cited in the memorandum, we agree that the Defendant is to be confined under house-arrest to an apartment in Manhattan with electronic monitoring and that he is to be supervised at all times by armed personnel under the supervision of Guidepost Solutions.

Despite your Honor's suggestion at the Defendant's Arraignment that the parties "try and work these issues out", we regret to inform the Court that the Government persists in its position that the defendant should be detained until trial and refuses to consent to any Bail package, including the conditions outlined herein which in our judgment, completely remove any risk of flight, the only concern a District Court should address under the very unique facts of this case as applied to this defendant.

As we more fully discuss in the Memorandum, Mr. Zarrab has no prior criminal record and is a very prominent and successful businessman in Turkey with a long

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history of lawful employment, and extraordinary philanthropic work. Furthermore, Mr. Zarrab's wife is one of Turkey's most well known, successful professional singers with a world following and Mr. Zarrab's extended family is considered one of the most respected and independently successful in the region.

Mr. Zarrab has retained experienced counsel who believe that the charges in this matter are very defensible and have so informed him. Finally, we note that the complicated White Collar nature of these allegations are document intensive and accordingly, it will impose extraordinary hardship on the Defendant and counsel if required to address these matters from within a maximum security prison, especially when in this case we are presenting the Court with severely restrictive conditions that will virtually guarantee the defendant's appearance throughout the duration of these proceedings.

We have copied the Government on this letter and the enclosed materials and are respectfully requesting that your Honor schedule a Detention Hearing and oral argument on our Bail application at the earliest possible time convenient to the court and all parties.

Respectfully,


Ben Brafman

cc: Sidhardha Kamaraju (Sidhardha.Kamaraju@usdoj.gov)
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